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From: Friends of the Rapid River, PO Box 249, Pollock, Idaho 83547, 208.628.3956,

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To: U.S. Forest Service

fs-comments-northern-nezperce-salmon river@fs.fed.us ,barryphillips@fs.fed.us

3815 Schreiber Way, Coeur D'Alene, Idaho 83815

Cc: Slate Creek Ranger Jeff Shinn jshinn@fs.fed.us, Nez Clear NF supervisor Sheryl Probert cprobert@fs.fed.us

Re: Windy-Shingle proposed project

To: Windy-Shingle planning team or whomever is assembling scoping comments,

The "Friends of the Rapid River" (FRR) is "not" a 501c-3 nonprofit nor a for-profit, we are not a registered anything. What we are is a small group of local property owners and other interested folks who joined together a few years back to participate in the public review process that affect The Rapid River and nearby National Forest lands. We try to help the FS with gate maintenance and monitoring some of the FS land we live next to. We have is a lot of on-the-ground- experience, knowledge and passion for the Rapid River (IRA) and surrounding backcountry. As neighbors with the Forest Service we have an acute interest in this proposal. FRR appreciates the opportunity to provide input on the proposed Windy-Shingle project.

Members of FRR: Holly Endersby and Scott Stouder (husband and wife) own 60 acres and are adjoining landowners to the project area. Ray Petersen and Jenny Blaylock (husband and wife) own 60 adjacent to the National Forest above the river, Barb Hawkins owns 20 acres adjacent to the project area. John and Barbe Turner (husband and wife) own 80 acres adjacent to the project area. Jeff Halligan is the Ex. Dir. Of the Idaho Trails Association)

We live here because of the natural beauty, recreational and wildlife opportunities provided by our neighboring National Forest lands and waters. We all have substantial investments – both financially and emotionally – in our homes and properties and we all spend a lot of time hiking, riding, hunting, fishing, and wildlife viewing in all weather and conditions on the National Forest. We come from varied backgrounds, but we know this part of the Forest intimately and this project area is in our backyard and in our viewshed. We not only appreciate the Forest Service as good neighbors, but we appreciate the Agency's diligence and hard work as caretakers of this land. We could not attend the public meeting on January 31 in Riggins because, for those of us at home we live at approximately 4000 feet elevation and the snow storm that night precluded us driving off the mountain. In addition, some of us were not in the state at the time.

Regarding the Windy-Shingle project we have general comments for the project and more focused comments tied to specific proposed management units and treatments.

In General: The Windy-Shingle project area purpose and need is largely focused on tree health and reducing fuels for Wildland Urban Interface management. We recognize private development is within the community protection zone of the project, but, when viewed from the ground level, most existing structures and private land are all well downslope of the Forest Service land. Although fire behavior is difficult to predict, the existing private structures don't seem to be in an immediate threatening path of fire that might originate on National Forest land – at least not when looked at from the ground. These trees are mostly Ponderosa pine, fir, and larch species. We have watched and interacted with this forest for decades and we don't see insect and disease as an overbearing presence or particularly prevalent. From our observation it simply doesn't seem as big an issue as the language describing it in the project overview would make it appear. Insect and disease does exist in this forest – insects and disease exists in all forests – but we don't believe natural afflictions have come anywhere near “reducing the overall health and productivity” of this Forest as stated in the project overview.

From our perspective this is a very “productive” forest. It “has been producing”, and continues to “produce” abundant and healthy herds of elk, mule deer, whitetail deer, bear, wolves, wild salmon, trout, and steelhead as well as an array of diverse wildlife and vegetation, and trees, unlike few other areas. We have particular concerns regarding elk. In the Proposed Action description, the possible impacts to elk and moose are briefly discussed with the admission that this proposed action will reduce cover and security for elk (moose are not really present here), but that lack of cover is occurring anyway due to the “epidemic levels of insect and disease activity. In our opinion this is simply not true. From our experiences and time spent in this forest there is no “epidemic of insect and disease” here. This perspective as applied here in the Rapid River – that a healthy forest is one judged primarily by its capacity to vigorously grow wood fiber – and that the need for thermal and security cover for big game is somehow not as important, is troublesome. This land is unlike the Clearwater Basin or other areas further north. It's systemic steep canyon lands – it is part of the Hells Canyon ecosystem. The south slopes are all largely open and covered with bunch grass and north slopes are largely timbered. Elk and deer use these thicker stands of timber extensively for thermal cover during winter storms and security during big game hunting seasons. Although there is increasing encroachment of cheat grass and noxious weeds in some of the lower elevation benches and slopes there is no lack of early seral stage habitat and forage here. We would argue that the timbered habitat, especially the north slopes, are of more importance to big game at this time than more early seral stage habitat – especially given the increasing pressure from hunting, off-road vehicles and human activities. In addition to big game a probable lynx sighting was reported a few years back to IDFG in the area adjacent to Unit 11. Mountain Quail have also been observed, as recently as last October in Unit 11.

Specifics. We have specific concerns about unit 11 and unit 12B. Since these areas are very close to our private lands we visit these areas regularly and know them well. Unit 11 is largely populated with Ponderosa pine. It is predominantly 30 to 50-year-old, widely spaced and already as fire, insect, and disease resistant as any area in the forest. Indeed, the Forest Service own assessment of this unit echoes this observation. In a late January email exchange with adjacent landowner, Barbara Hawkins (Barbara owns 20 acres adjoining the Northern boundary of Unit 11), team leader Craig Phillips said this: *“The Fire and Fuels Specialist and several other members of the Interdisciplinary Team responsible for conducting the Environmental Review for this project visited the area near your property last summer. He agrees that the area adjacent to your property is in generally good condition, but believes the overall area could benefit from treatment, including prescribed fire. The Forest Health Program team*

assessment of the are did not highlight insect and disease issues adjacent to your property.” FRR asks why, if Unit 11 is presently healthy and not suffering from insect and disease, it would be targeted for treatment? In our view any “treatment” would cause disturbance and potentially make it more fire prone by decreasing shade, increasing fine fuels on the ground and introducing noxious weeds. Of higher concern is that Unit 11 is used extensively by elk for security and thermal cover especially during the spring transitional months. Several hundred elk spend the winter or pass through (depending upon the severity of the winter) the adjacent lands on Whitewater Wilderness Ranch development. There are roughly 2500 acres of old ranch land on this development which is largely dominated by open grass benches and hills. Over 14 miles of road service the development for access by land owners. As the weather warms in late winter and early spring the elk are drawn to, and (especially pregnant cow elk) need the green grass growing on the (old) hay pastures. Elk are often seen grazing on these benches and landowners are very tolerant – we welcome – the deer and elk. As winter turns to spring both traffic and increased human disturbance change their habits. They become more nocturnal and leave the private, open land before daylight to make the short trip uphill to the National Forest (Unit 11 and adjacent FS lands). The timbered National Forest offer needed security and is an important component in keeping these rather substantial herds healthy. There is an old, short road prism that has been gated for about 12 years that defines the western boundary of Unit 11 (it has been referred to as 624A) which extends from the main FS White Bird Ridge Rd. (624). Any increased use and activity on this road will have adverse effect on the elk and deer that depend upon the area. This old road is directly above and adjacent to our private properties and many of us have a history with it. About 12 years ago, several of us approached then Slate Creek Ranger, Jack Carlson and asked for help in controlling illegal traffic on this old road. Although identified as closed to motorized traffic in the amended forest plan, the road had never been physically closed, there was no enforcement and motorized activity occurred both day and night. We had instances of drunken drivers with automatic weapons driving on this road at night and spraying bullets indiscriminately - seriously. They evidently had no idea that residents were living just below and within their line of fire. The Slate Creek Ranger and his staff helped us install gates and barriers at key points. He also brought in a backhoe and created drainage ditches in the old, muddy, and rutted road bed. For a few years following that procedure people drove around and vandalize the barriers, cut locks on the gates, etc. Each time we repaired the damage. After a short time folks got used to it and, in the past decade, we’ve had few, if any, transgressions, or complaints. The old road bed is now covered in thick Mountain Brome grass - excellent elk forage – beneath the Pine trees. We are very concerned how the unintended consequences of management activities in unit 11 will potentially affect today’s wildlife status quo, introduce noxious weeds and expose us once again to potentially dangerous and illegal activities.

Regarding unit 12B. A large portion of this unit, as far as what we can see on the map, is immediately south of the two gates on Wildhorse Saddle and is basically on the ridge that lies between the two old, closed roads. Per the proposed action in the public scoping documents this area is slated for “regeneration harvest.” Correct us if we’re wrong, but this seems like another name for what we used to call “shelter woods” or simply small clear-cuts with some trees left? This is a high knob and these trees grew “stand dependent”. This area, once thinned up to 70 percent and exposed to a severe wind storm – which occur regularly here - will potentially become an actual “clear-cut” from wind damage. Presently elk use the top of this ridge extensively as the present cover provides both security and thermal protection. In addition, the old roads on either side of this knob are presently gated and closed to motorized traffic except for administrative use. The gates on these roads have a similar history as the

one on 624A. This area was closed to motorized use for wildlife security in the existing Forest Plan. Several years ago both gates had been left vandalized and rendered inoperable. Folks simply paid no attention to the broken signs and destroyed gates. We worked with the District's staff to restore and repair the gates and put up new signage. We've assisted the Agency by repairing and monitoring the gates for nearly a decade now and people are accustomed to parking at the gates and following the non-motorized rules. Most hunters not only prefer this arrangement, but during hunting season the area behind the gates to the Payette National Forest boundary has become relatively "user enforced." There are still complications and illegal activity especially on the south end of this road where the Indian Creek road (#2056 which is presently motorized) and this road (#9928) meet on the Payette NF line because enforcement out there is nearly impossible. As with Unit 11 these problems would be better observed and discussed on-the-ground. Keeping the gates at Wildhorse Saddle functional has been a great benefit to both the quality of user experience and to the wildlife, primarily to protect the ridgeline as a summer elk calving area and for security during Fall hunting season. To be clear the entire ridgeline behind the gates, south to the Payette NF and over Lockwood and beyond to Pollock Mountain is a valuable high altitude summer elk and deer area and seasonal migration corridor for elk and mule deer. We want to discuss how the proposed activities and temporary road use will affect these values for both users and wildlife and how a slightly different approach to planned activities out there might accommodate everyone's needs.

All of these concerns and suggestions we'd like to talk over with the District Ranger and any other agency folks who care to participate. We need to do this "on the ground." The heavy winter this year has precluded access to these areas since early December. As these comments are written deep snow drifts don't yet allow access to the top of the Whitebird Ridge Road (624). The Friends of the Rapid River request, and would much appreciate an arrangement of time – after access is available - to observe/walk these specific areas and talk about our concerns.

Thank you for considering our comments: Friends of the Rapid River: Scott Stouder, Holly Endersby, Barbara Hawkins, Ray Petersen, Jenny Blaylock, Jeff Haligan, John Turner, Barbe Turner.

cc: Dave Cadwallader, Bill Higgins, Brad Smith, Alex Irby, Dale Harris, Regan Berkley, Jerome Hansen, Brad Brooks, Jonathan Oppenhiemer,